

August 11, 2015

VIA ECF

The Honorable Donna M. Ryu
United States District Court
Northern District of California
Oakland Courthouse
Courtroom 4 - 3rd Floor
1301 Clay Street, Oakland, CA 94612

Re: In re Korean Ramen Antitrust Litigation, Case No. 3:13-CV-4115-WHO-DMR
Parties' Joint Status Update Regarding Discovery Dispute

Dear Judge Ryu:

Following the discovery status conference on August 4, 2015 and pursuant to the Court's minute Order (Doc. No. 187), the parties submit this joint status update to inform the Court of the parties' meet and confer efforts regarding how hard copy documents should be produced and which party should bear the cost of converting hard copy documents into text-readable electronic files. On August 6, Defendants¹ provided information the Court ordered them to provide regarding the volume and location of the hard copy documents and estimated costs associated with converting the documents to text-readable electronic files. Defendants are still investigating whether information contained in certain of the hard copy documents also exists in electronic format. On August 7, the parties participated in a follow-up telephonic conference call during which, among other things, Plaintiffs requested additional information about the hard copy documents for use in potentially resolving the issue without the need for Court intervention. Defendants are currently gathering responses to Plaintiffs' follow-up questions.

In its minute Order, the Court directed that, if the parties were unable to resolve their dispute, they were to file a joint discovery letter by today, August 11. In light of the parties' ongoing meet and confer efforts, the parties wish to continue to meet and confer to potentially resolve this dispute. Accordingly, the parties hereby submit this letter and inform the Court that they have agreed to continue to meet and confer through August 13 and, in the event the parties cannot resolve the dispute by that time, will submit a joint discovery letter to the Court by August 14.

RESPECTFULLY SUBMITTED,

Signatures of Submitting Parties' Counsel on the Following Page

¹ The Court has been informed previously by counsel for Defendant Samyang Foods Co. Ltd. ("Samyang Korea") that it has reached a settlement in principle with Plaintiffs (*see* Doc. No. 189). Accordingly, Samyang Korea is not participating in this submission.

The Honorable Donna M. Ryu
August 11, 2015

Page| 2

DATED: August 11, 2015

/s/ Christopher L. Lebsock

Christopher L. Lebsock
HAUSFELD LLP

Lee Albert
GLANCY PRONGAY AND MURRAY LLP

*Interim Lead Counsel for the Direct Purchaser
Plaintiffs*

DATED: August 11, 2015

/s/ Robert A. IZARD

Robert A. IZARD
IZARD NOBEL LLP

*Interim Lead Counsel for the Indirect Purchaser
Plaintiffs*

DATED: August 11, 2015

/s/ Anne Choi Goodwin

Anne Choi Goodwin
SQUIRE PATTON BOGGS (US) LLP

*Attorneys for Defendants
Nongshim Co. Ltd. and Nongshim America, Inc.*

DATED: August 11, 2015

/s/ Minae Yu

Minae Yu
GIBSON, DUNN & CRUTCHER LLP

*Attorneys for Defendants
Ottogi Co. Ltd. and Ottogi America, Inc.*

The Honorable Donna M. Ryu
August 11, 2015

Page| 3

ATTESTATION OF CONCURRENCE

I, Anne Goodwin, hereby attest that I am counsel for Defendants Nongshim Co. Ltd. and Nongshim America, Inc. and that concurrence in the filing of this document has been obtained from its signatories.

DATED: August 11, 2015

/s/ Anne Choi Goodwin

Anne Choi Goodwin

SQUIRE PATTON BOGGS (US) LLP

Attorneys for Defendants

Nongshim Co. Ltd. and Nongshim America, Inc.